

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MAJOR, LINDSEY & AFRICA, LLC,

Plaintiff,

- against -

SHARON MAHN, CARLO PECORARI,  
PARKER LELAND, INC., JOSHUA KAGAN,  
and KAGAN CONSULTANTS INC.,

Defendants.  
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10 Civ. 4239 (CM)

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**SHARON MAHN'S MOTION TO  
DISMISS AND/OR TO STAY  
PLAINTIFF'S CLAIMS**

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PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Defendant Sharon Mahn's Motion to Dismiss and/or to Stay Plaintiff's Claims, the Declaration of Judith L. Mogul, and the evidence annexed thereto, and upon all the pleadings and proceedings filed and had herein, the undersigned will move this Court, before the Honorable Colleen McMahon, on a date to be determined by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order (1) dismissing plaintiff's claims against Sharon Mahn, pursuant to Federal Rule of Civil Procedure 12(b)(6) and § 3 of the Federal Arbitration Act or in the alternative staying plaintiff's claims for injunctive relief against Ms. Mahn, and (2) staying plaintiff's claims against Ms. Mahn's co-defendants.

Dated: New York, New York  
July 13, 2010

MORVILLO, ABRAMOWITZ, GRAND,  
IASON, ANELLO & BOHRER, P.C.

By: /s/ Judith L. Mogul  
Judith L. Mogul  
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